

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Transition from TTY to Real-Time Text)	CG Docket No. 16-145
Technology)	
)	
Petition for Rulemaking to Update the)	GN Docket No. 15-178
Commission's Rules for Access to Support the)	
Transition from TTY to Real-Time Text)	
Technology, and Petition for Waiver of Rules)	
Requiring Support of TTY Technology)	

**T-MOBILE USA, INC. FURTHER NOTICE OF PROPOSED RULEMAKING
REPLY COMMENTS**

T-Mobile USA, Inc. ("T-Mobile")¹ is committed to deploying real-time text ("RTT") over IP-based networks. As the Commission considers the proposals set forth in the Further Notice of Proposed Rulemaking ("FNPRM"),² it must ensure that its RTT rules remain grounded in feasibility, subject to the statutory limitations on what is achievable and readily achievable. To that end, T-Mobile encourages the Commission to reject calls for expanding the scope of the backwards compatibility obligation as well as to refrain from adopting new and onerous mandates on carriers.

In the record for this FNPRM, some commenters express support for RTT paradigms that are not technically feasible. For instance, BRETSA states that the Commission should require

¹ T-Mobile USA, Inc., is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

² *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, FCC No. 16-169, CG Docket No. 16-145 & GN Docket No. 15-178 (rel. Dec. 16, 2016).

RTT to be backwards compatible with short message service (“SMS”).³ SMS and RTT are two entirely different communications protocols—SMS is a best-effort, store-and-forward service, while RTT is a session-based, two-way communication similar to voice calling. Therefore, making RTT backwards compatible with SMS is not feasible. Moreover, as a policy matter, requiring carrier support of RTT compatibility with SMS would defeat the goal of universal implementation of RTT. This model would seem to require carriers to maintain SMS indefinitely regardless of its obsolescence, which is not ideal. SMS-to-911 was always intended to be an interim solution until more appropriate technologies for text-based communications with 911 were adopted. The Commission should support the adoption of RTT for emergency communications going forward and refrain from imposing obligations that would require carriers to devote resources to the legacy technologies that RTT is intended to replace.

NASNA, in turn, has suggested that the Commission wait to reassess the backwards compatibility obligation until after the sunset of the Public Switched Telephone Network (“PSTN”).⁴ Once the PSTN has sunset, consumers will no longer be able to use TTY to contact PSAPs because it is a circuit switched technology that relies on the PSTN. Hence, to the extent NASNA may mean that consumers should still be able to use TTY after the sunset of the PSTN, T-Mobile disagrees, as this suggestion would impose an infeasible requirement on carriers. T-Mobile believes it is reasonable for the Commission to reassess the backwards compatibility requirement before the sunset of the PSTN—but in no event should that reassessment occur any later than the sunset of the PSTN.

³ Comments of The Boulder Regional Emergency Telephone Service Authority (“BRETSA”) at 8. Unless otherwise noted, all comments referenced herein were filed in CG Docket No. 16-145 & GN Docket No. 15-178 on February 22, 2017.

⁴ Comments of National Association of State 911 Administrators (“NASNA”) at 3-4.

Finally, T-Mobile agrees with AT&T and CTIA that the FCC should refrain from imposing additional reporting requirements.⁵ As AT&T notes, carriers adopting RTT under the 2016 waiver will continue to file progress reports as required by that waiver; new and additional obligations are unnecessary.⁶ And as CTIA notes, “wireless providers and equipment manufacturers already have sufficient market-based incentives to implement, offer, and promote the availability of RTT services to meet the Commission’s existing TTY obligations.”⁷

T-Mobile also agrees with CTIA that the Commission should refrain from adopting new mandatory features for RTT.⁸ Insofar as new features will improve the accessibility of products and services, including RTT, carriers are already obligated to offer such features where achievable or readily achievable.⁹ In this regard, T-Mobile continues to investigate new and better ways of making its products and services accessible.

⁵ Comments of AT&T at 2; Comments of CTIA at 9.

⁶ Comments of AT&T at 2.

⁷ Comments of CTIA at 9. *See also* Commissioner Michael O’Rielly, *Taking Stock of FCC Paperwork Burdens*, FCC BLOG (Mar. 3, 2017, 4:15 PM), <https://www.fcc.gov/news-events/blog/2017/03/03/taking-stock-fcc-paperwork-burdens> (“We must be careful not to place undue burdens on companies whether in specific rulemakings, or as the product of cumulative Commission actions.”).

⁸ Comments of CTIA at 7-9.

⁹ 47 U.S.C. § 255(c); *id.* § 617(b)(1).

Respectfully submitted,

/s/ Steve Sharkey

Steve Sharkey

Eric Hagerson

Shellie Blakeney

T-MOBILE USA, INC.

601 Pennsylvania Ave., NW

Washington, DC 20004

(202) 654-5900

Kristine Laudadio Devine

HARRIS, WILTSHIRE & GRANNIS LLP

1919 M Street NW, Eighth Floor

Washington, DC 20036

(202) 730-1300

Counsel to T-Mobile USA, Inc.

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